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March 21, 2001

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General Counsel's Office
FEC
999 E St. NW
Washington D.C. 20463
attn: Jeff S. Jordan, Supervisory Attorney

RE: MUR 5178

Dear Mr. Jordan:

This letter constitutes the response of the Michigan Democratic State Central Committee (MDSCC) and Roger Winkelman to the above complaint.

The complaint has no merit because it is based on an error in reporting, which was promptly corrected once discovered. In the 30 Day Post Election Report referred to in paragraph 7 of the Complaint, the MDSCC erroneously reported on Schedule F two \$45,000 expenditures coordinated with Byrum for Congress. Both expenditures related to Debbie Stabenow for Senate, not Byrum for Congress. A corrected Schedule F, a copy of which is attached, was filed recently.

The MDSCC did not violate the coordinated spending limitations of 2 U.S.C. § 441a(d), given that the two expenditures complained of were not for Byrum for Congress, as reflected in the amended report. The MDSCC is not required to be completely error-free in its reporting. 2 U.S.C. § 432(i); 11 CFR § 104.7(a). Once the inadvertent reporting error was detected, it was promptly corrected.

Because the complaint is premised on erroneous facts, it should be dismissed.

Yours truly,

SACHS WALDMAN Professional Corporation

Andrew Nickelhoff

cc: Mark Brewer, Chair
Roger Winkelman

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
Mar 26 1 16 PM '01

SCHEDULE F

**ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))**

Page 1 of 1 for
LINE NUMBER 15

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)				
MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Media Strategies 445 Union Blvd. Lakewood, CO 80228	Debbie Stabenow D16, SENATE	Advertising	10/30/00	\$45,000
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Media Strategies 445 Union Blvd. Lakewood, CO 80228	Debbie Stabenow U.S. SENATE	Advertising	11/01/00	\$45,000
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate—\$				
SUBTOTAL of Expenditures This Page (optional)				\$90,000
TOTAL This Period (last page this line number only)				\$90,000

21/2001 11:24

10/2001 11:53

NO. 440 002

NO. 410 007

STATEMENT OF DESIGNATION OF COUNSEL

MUR 5178

NAME OF COUNSEL: Andrew Nickelhoff

FIRM: Sachs Waldman, Professional Corporation

ADDRESS: 1000 Farmer Street

Detroit, MI 48226

TELEPHONE: (313) 496-9429

FAX: (313) 965-4602

The above-named individual is hereby designated as my counsel
and is authorized to receive any notifications and other communications
from the Commission and to act on my behalf before the Commission.

3/21/01
Date

Mark Brumer
Signature

RESPONDENT'S NAME: Michigan Democratic State Central Committee

ADDRESS: 606 Townsend

Lansing, MI 48933

TELEPHONE: HOME()

BUSINESS(517) 371-5410